

ORIGINAL

EX PARTE OR LATE FILED

202-418-2801

Peggy Arvanitas

RECEIVED

2/22/2000

MAR - 8 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Kennard,

98-184

I sent Ileri from Florida PSC mentioned me. I'm the private citizen, the other 1/2 of the telecommunications assault in Florida. I also wrote to 20-state PSC in the U.S. to define the NANPA issue & utilization thresholds instead of MTE shoots.

Right now, you have NANC meetings where PSC staff members are shut out of teleconference calls with number charges.

Martin Lockheed & Neustar ceasing to negotiate number pooling modifications to INC guidelines.

No. of Copies rec'd 1  
List ABCDE

It's getting ugly.

But read my filing. GTE

(& BellSouth) were not LNP capable Dec 30, 1998 (as per 95-116 portability). Millions of dollars are owed to the general public. What will you do? PJA

Before the Federal Communications Commission  
Washington DC 20554

*Time Warner  
See pg 2*

In the matter of

Comment on Supplemental Filing  
Submitted by Bell Atlantic Corporation  
and GTE Corporation

CC Docket No. 98-184

RECEIVED  
*2/13/2000*

MAR - 8 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

*Peggy Arvanitas  
PO Box 8737  
Seminole, FL 33775  
(727)-742-1386*

This is in response to the Applicant's supplemental filing on Jan. 27, 2000 regarding the pending transfer applications. As a resident of Tampa Bay area, this area being 21st of top 100 Metropolitan Service Areas in the US, I am proposing to deny the merger at this time. Contrary to the statements made by the Applicants, the merger will not serve the Public's interest. GTE is not LBN-LNP capable in even our top MSA market as of Dec. 31, 1999 being 12 months behind schedule, as dictated by FCC 95-116 third order (May 1998) and re-affirmed by the 4th order (June 1999) as it relates to portability. As per the order, top 100 MSA's must be LNP capable by December 31, 1998. The order further stipulated that companies could not charge for portability (in our area 76¢ /mo. for residential) and \$3.25 per trunk line- business customers) unless they could port. Outside the top 100 MSA's, a CLEC had to make a demand and they had a different timetable. I am enclosing the LERG which is the 952 LATA area. The NPA's it serves are: 813, 727, 941 and 863. This is a late 1999 LERG which will show GTE is not LNP capable in over 30% of our MSA, and they charged our whole area a portability charge starting February 1, 1999. This is also in violation of the FCC 95-116 third order which stated they could not charge for portability if they were not LNP capable.

( continued)

Not only has the PUBLIC been violated ( and it is my belief that Tampa Bay area is not an isolated incident) CLEC's, most being cable companies wanting to provide local (business) phone service, are unable to compete for service. It is my belief that for this merger to occur, Bell Atlantic and GTE had a check-list of requirements showing that they allowed competition into their local markets. If these "baby bells" have not upgraded their equipment and done the provisioning on their switches to be LNP capable, how are cable companies (CLEC's) able to compete? GTE, being 12 months behind the FCC portability dates, are excluding companies like Time Warner in the commercial business phone market in the Tampa Bay area, which is a very lucrative market. This is in direct contradiction to Bell Atlantic-GTE's statements:

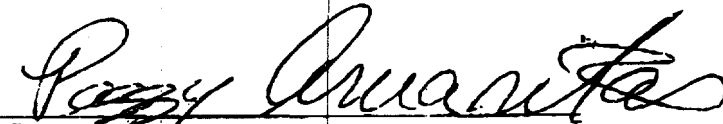
"...that no aspect of the merger will produce significant anti-competitive effects in any telecommunications market."

I am also severely troubled that FCC would also allow GTE Internetworking to a corporation (DataCo) that in 5 years would revert back to GTE in the way of 80% conversion of equity interest. That is like storing your wife in the Bahamas while you're married to your mistress in Tahiti. Would you allow this same scenario to a cable company?

I am shamed at the thought that Mr. Kennard of the FCC has not seen fit to monitor and review the performance of the Industry, as it relates to the general public. As FCC, NANPA, and most state PSC's have stated, "These are the public's numbers." If major corporations are allowed to violate FCC orders, such as FCC 95-116 (3rd and 4th order), the Commission abrogates its responsibilities for the PUBLIC to the garbage can. The PUBLIC is served when GTE and Bell Atlantic are 100% LNP capable in their top 100 MSA's, thereby not only insuring the ability of CLECs to compete, but to insure the charges on the PUBLIC's phone bills are for services these companies can perform AT THE TIME OF THE CHARGING. It is not my belief the order meant " Charge customers now before being LNP capable to port."

It is my sincere wish, therefore, not being employed by cable or baby-bell companies, and having not been paid for my opinion, that the FCC will seriously look into these charges and review the LERGs in the GTE-Bell Atlantic areas, and substantiate the claims that I am making in this filing. From the interpretation I have, at this time, that would mean millions of dollars are owed to the Tampa Bay area GTE customers for being charged for portability when in fact GTE was not LNP capable. I am submitting these and earlier LERGs, therefore to the Office of Public Council- to the attention of Charles Beck, for Florida's further review and action.

These are my statements as of February 13, 2000 as a citizen in Pinellas County.



Peggy Arvanitas  
(727)-742-1386 home  
pegremax2000@yahoo.com